

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

JILL HINES, ET AL.,

Plaintiffs,

v.

ALEX STAMOS, ET AL.,

Defendants.

Civil Action No. 3:23-cv-00571

Chief Judge Terry A. Doughty

Magistrate Judge Kayla D. McClusky

**DEFENDANT THE ASPEN INSTITUTE'S MOTION TO COMPEL INDIVIDUAL
ARBITRATION AND STAY ALL PROCEEDINGS**

NOW INTO COURT through undersigned counsel, comes defendant, The Aspen Institute ("Aspen"), which asks this Court to compel Plaintiffs to arbitrate this matter. Plaintiffs should not be allowed to evade their agreements with social-media companies to arbitrate disputes over content moderation on those companies' platforms by choosing to sue third parties, like Aspen, rather than the social-media companies that removed that content.

Accordingly, Aspen asks that this Court enter an Order compelling individual arbitration and staying further litigation of Plaintiffs' claims until the completion of the arbitrations. In support of this motion, Aspen submits the accompanying memorandum of law and the declaration of Sarah Sanders.

Dated: December 18, 2023

Respectfully submitted,

By: /s/ Elizabeth M. Carmody
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Attorney for Defendant The Aspen Institute

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 18th day of December, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will provide notice of electronic filing to the attorneys for all parties.

/s/ Elizabeth M. Carmody
Elizabeth Mendell Carmody